

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

HELEN A. RUNGE,	:	
Plaintiff	:	
	:	
v.	:	No. 05-10849-RGS
	:	(Judge Stearns)
WALTER J. KELLY; KERRY L.	:	
BLOOMINGDALE, M.D.; and	:	
SUNBRIDGE NURSING AND	:	CIVIL ACTION
REHABILITATION CENTER,	:	
Defendants	:	JURY TRIAL DEMANDED

PLAINTIFF HELEN A. RUNGE'S ASSENTED-TO-MOTION  
FOR EXTENSION OF TIME TO RESPOND TO  
DEFENDANT WALTER J. KELLY'S MOTION TO DISMISS

AND NOW, COMES, Plaintiff, Helen A. Runge ("Plaintiff"), and requests this Honorable Court to grant Plaintiff an extension of two weeks to file a response to the Motion to Dismiss of Defendant Walter J. Kelly. As grounds therefor, Plaintiff states as follows:

1. Defendant Kelly filed a Motion to Dismiss on July 18, 2005.
2. Plaintiff's response to Defendant Kelly's Motion is due August 1, 2005.
3. Plaintiff requires additional time to respond to Defendant Kelly's Motion, and Defendant Kelly, through counsel, has provided assent to this request.
4. Additionally, the remaining Defendant parties who have filed an appearance in this matter, to wit: Defendant Kerry L. Bloomingdale and Defendant

Sunbridge Nursing and Rehabilitation Center, through counsel, have assented to this Motion.

5. No parties will be prejudiced by the granting of this motion and its extension of time.

WHEREFORE, Plaintiff, Helen A. Runge, moves this Honorable Court to grant her motion for extension until August 16, 2005, to file her response to Defendant Kelly's Motion to Dismiss.

Respectfully submitted,

LATSHA DAVIS YOHE & MCKENNA, P.C.

Dated: July 29, 2005

By /s/ Glenn R. Davis  
Glenn R. Davis, Esq.  
1700 Bent Creek Boulevard, Suite 140  
Mechanicsburg, PA 17050  
(717) 620-2424  
gdavis@ldylaw.com  
*Pro Hac Vice*

Attorneys for Plaintiff, Helen A. Runge

#### LOCAL RULE 7.1 CERTIFICATION

I, Glenn R. Davis, counsel for Plaintiff, Helen A. Runge, certify that I have spoken with counsel for Defendants Walter J. Kelly, Defendant Kerry L. Bloomingdale, M.D., and Sunbridge Nursing and Rehabilitation Center regarding Plaintiff, Helen A. Runge's motion for extension to file a response. All parties have assented to this motion.

Dated: July 29, 2005

/s/ Glenn R. Davis  
Glenn R. Davis